

TROY LAW, PLLC
ATTORNEYS/COUNSELORS AT LAW
Tel: 718 762 1324 johnstroy@troypllc.com Fax: 718 762 1342
41-25 Kissena Blvd., Suite 119, Flushing, New York 11355

February 14, 2018

Via ECF

The Honorable George B. Daniels
United District Court
Southern District of New York
500 Pearl Street, Courtroom 11 A
New York, NY 10007

Re: Letter Motion to Compel Production of Defendants for Depositions
Chen et al v. Hunan Manor Enterprise, Inc. et al – 17-cv-00802

Dear Judge Daniels,

We represent the Plaintiffs in the above referenced action. We respectfully submit this letter to compel Defendants for their depositions. The parties had made several attempted to resolve this issues by themselves, but the parties have not reached an agreement to resolve this issue.

Plaintiffs have propounded the notices of depositions to Defendants on May 16, 2017. We have reached out to Defendants' counsel for numerous times, via telephone, in person, and via email. Defendants have *refused* to schedule depositions. In their last correspondence, Defendants stated that we should seek court intervention to schedule depositions.

Plaintiffs respectfully request the Court to enter an order for Defendants to schedule and appear for depositions.

Respectfully,

By: /s/ John Troy
John Troy
Troy Law PLLC.
41-25 Kissena Boulevard, Suite 119
Flushing, NY 11355

Cc: Attorneys of record